United States Courts Southern District of Texas FILED

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

MAY 1 6 2019

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

\$
V. \$
CR. NO. H-18-509

\$
YUSUF ADEBOWALE MASHA

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

<u>COUNT 1</u> (FALSE USE OF A PASSPORT - 18 U.S.C. §1543)

On or about November 24, 2015, in the Houston Division of the Southern District of Texas,

YUSUF ADEBOWALE MASHA,

Defendant herein, did then and there willfully and knowingly use and attempt to use a forged and/or counterfeit passport purported to be issued by the Federal Republic of Nigeria in the name of Adam Adewale Carter, to open an account at Bank of America, and the defendant knew said passport was forged, counterfeit and otherwise procured unlawfully.

In violation of Title 18, United States Code, Sections 1543 and 2.

COUNT 2 (FALSE USE OF A PASSPORT - 18 U.S.C. §1543)

On or about December 16, 2015, in the Houston Division of the Southern District of Texas,

YUSUF ADEBOWALE MASHA,

Defendant herein, did then and there willfully and knowingly use and attempt to use a forged and/or counterfeit passport purported to be issued by the Federal Republic of Nigeria in the name of Adam Adewale Carter, to open an account at Chase Bank, and the defendant knew said passport was forged, counterfeit and otherwise procured unlawfully.

In violation of Title 18, United States Code, Sections 1543 and 2.

COUNT 3 (FALSE USE OF A PASSPORT - 18 U.S.C. §1543)

On or about December 22, 2015, in the Houston Division of the Southern District of Texas,

YUSUF ADEBOWALE MASHA,

Defendant herein, did then and there willfully and knowingly use and attempt to use a forged and/or counterfeit passport purported to be issued by the Federal Republic of Nigeria in the name of Adam Adewale Carter, to open an account at Capital One Bank, and the defendant knew said passport was forged, counterfeit and otherwise procured unlawfully.

In violation of Title 18, United States Code, Sections 1543 and 2.

<u>COUNT 4</u> (FALSE USE OF A PASSPORT - 18 U.S.C. §1543)

On or about March 18, 2016, in the Houston Division of the Southern District of Texas,

YUSUF ADEBOWALE MASHA,

Defendant herein, did then and there willfully and knowingly use and attempt to use a forged and/or counterfeit passport purported to be issued by the Federal Republic of

Nigeria in the name of Adam Adewale Carter, to make a deposit to an account at Bank of America, and the defendant knew said passport was forged, counterfeit and otherwise procured unlawfully.

In violation of Title 18, United States Code, Sections 1543 and 2.

<u>COUNT 5</u> (FALSE USE OF A PASSPORT - 18 U.S.C. §1543)

On or about April 13, 2017, in the Houston Division of the Southern District of Texas,

YUSUF ADEBOWALE MASHA,

Defendant herein, did then and there willfully and knowingly use and attempt to use a forged and/or counterfeit passport purported to be issued by the United Kingdom of Great Britain and Northern Ireland in the name of Moses Campbell, to open an account at Chase Bank, and the defendant knew said passport was forged, counterfeit and otherwise procured unlawfully.

In violation of Title 18, United States Code, Sections 1543 and 2.

<u>COUNT 6</u> (FALSE USE OF A PASSPORT - 18 U.S.C. §1543)

On or about April 13, 2017, in the Houston Division of the Southern District of Texas,

YUSUF ADEBOWALE MASHA,

Defendant herein, did then and there willfully and knowingly use and attempt to use a forged and/or counterfeit passport purported to be issued by the United Kingdom of Great

Britain and Northern Ireland in the name of Moses Campbell, to open an account at Bank of America, and the defendant knew said passport was forged, counterfeit and otherwise

procured unlawfully.

In violation of Title 18, United States Code, Sections 1543 and 2.

(FALSE USE OF A PASSPORT - 18 U.S.C. §1543)

On or about November 6, 2017, in the Houston Division of the Southern District

of Texas,

YUSUF ADEBOWALE MASHA,

Defendant herein, did then and there willfully and knowingly use and attempt to use a

forged and/or counterfeit passport purported to be issued by the United Kingdom of Great

Britain and Northern Ireland in the name of Moses Campbell, to open an account at Wells

Fargo Bank, and the defendant knew said passport was forged, counterfeit and otherwise

procured unlawfully.

In violation of Title 18, United States Code, Sections 1543 and 2.

TRUE BILL:

Original Signature on File

FOREPERSON OF THE GRAND JURY

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RYAN K. PATRICK United States Attorney

By:

AYMILEMAN

Assistant United States Attorney